

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, ET AL.,)	
)	
Plaintiffs,)	
)	CIVIL ACTION
vs.)	
)	FILE NO. 1:17-cv-2989-AT
BRAD RAFFENSPERGER,)	
ET AL.,)	
)	
Defendants.)	

**COALITION PLAINTIFFS' MOTION FOR EXTENSION OF TIME
AND FOR ADDITIONAL PAGES**

Pursuant to Local Rule 7.1(D) and Part III(a) of this Court's Standing Order, the Coalition Plaintiffs move the Court for permission to submit a Reply Brief in Support of its Motion for Preliminary Injunction that does not exceed forty-five (45) pages, inclusive of a portion of the brief that may need to be filed under seal, *and* for a one-day extension of time to file the brief until Thursday, July 18, 2019 (the brief is currently due Wednesday, July 17, 2019). The Coalition Plaintiffs show that the Reply is in response to the 75 page brief of the State Defendants and the 27 page brief filed by the Fulton County Defendants.

As for a one-day extension of time, the Coalition Plaintiffs show that counsel have been working diligently on the brief since the Responses were filed

Wednesday evening, July 10, 2019. Pursuant to Part III(a) of this Court's Standing Order, the unforeseen circumstance necessitating this extension is the difficult and extremely time-consuming dispute with the State Defendants concerning discovery of the GEMS databases, including a telephonic hearing on said discovery on Thursday, July 11, 2019, and prolonged engagement with State Defendants concerning their misrepresentations about the GEMS databases extending through yesterday, July 15, 2019. The contents of the State Defendants' misrepresentations, and their ramifications, will be addressed in the Reply Brief and are outlined in the Joint Discovery filing of the State Defendants and the Curling Plaintiffs, including most specifically the Declaration of Dr. Halderman, which the Coalition Plaintiffs understand will be filed under seal later this morning.

A proposed order granting additional pages and time is attached.

Respectfully submitted this 16th day of June, 2019.

/s/ Bruce P. Brown

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CERTIFICATE OF COMPLIANCE

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ Bruce P. Brown
Bruce P. Brown

CERTIFICATE OF SERVICE

This is to certify that I have this day caused the foregoing to be served upon all other parties in this action by via electronic delivery using the PACER-ECF system.

This 16th day of July, 2019.

/s/ Bruce P. Brown
Bruce P. Brown

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**PROPOSED ORDER GRANTING COALITION PLAINTIFFS' MOTION
FOR ADDITIONAL PAGES AND EXTENSION OF TIME**

Good cause having been shown, the Motion of Coalition Plaintiffs for Additional Pages and an Extension of Time is GRANTED. Coalition Plaintiffs' Reply Brief in Support of its Motion for Preliminary Injunction shall not exceed forty-five (45) pages, inclusive of briefing filed under seal, and is due to be filed no later than July 18, 2019.

SO ORDERED this ____ day of July, 2019.

Amy Totenberg
United States District Judge